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Braidwood Station
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April 4, 2012
BW120031

10 CFR 55

Ms. Cynthia Pederson
Acting Regional Administrator - Region III
U. S. Nuclear Regulatory Commission
2443 Warrenville Road, Suite 210
Lisle, IL 60532-4352

Braidwood Station, Units 1 and 2
Facility Operating License Nos. NPF-72 and NPF-77
NRC Docket Nos. STN 50-456 and STN 50-457

Subject: Request for Initial Operator License Waivers

Exelon Generation Company, LLC (EGC) Braidwood Station is submitting waiver requests for two initial license operator candidates: Mr. Blake R. Baxter and Mr. Zachary B. Montpetit. In support of the next scheduled operator license examination scheduled to begin on March 25, 2013, Braidwood Station requests a waiver of the experience requirements for both direct Senior Reactor Operator (SRO) candidates. Mr. Baxter is a degreed Operations field supervisor and Mr. Montpetit is a degreed, non-licensed operator. Both candidates are seeking direct SRO license application, but do not meet the three years experience requirement specified in National Academy for Nuclear Training (NANT) Academy Document (ACAD) 00-003, "Guidelines for Initial Training and Qualification of Licensed Operators," Revision 1, dated April 2004.

Technical Specification (TS) 5.3.1 requires that the education and experience eligibility requirements for operator license applicants, (described in Exelon letter RS-07-078, dated July 19, 2007), and changes thereto, shall be approved by the NRC. The current regulatory requirement specified in the TS 5.3.1 referenced letter is consistent with the education and experience eligibility requirements in NANT ACAD 00-003. As described in NANT ACAD 00-03; a degreed manager or degreed, non-licensed operator (direct SRO applicant) must have served a minimum of three years as a qualified non-licensed operator or Operations supervisor.

On March 20, 1985, the NRC issued the Commission Policy Statement on Training and Qualification of Nuclear Power Plant Personnel, which endorsed the training accreditation program developed by INPO, in association with its National Academy for Nuclear Training (NANT). The NRC has documented approval and acceptance of NANT guidelines in RIS 2001-01, "Eligibility of Operator License Applicants," NUREG-1021, Revision 9, "Operator Licensing Examination Standards For Power Reactors," and Regulatory Guide (RG) 1.8, "Qualification and Training of Personnel for Nuclear Power Plants." These documents state that a facility licensee's training program would be considered approved by the NRC when it is accredited by the National Nuclear Accrediting Board and that NANT guidelines for education and experience outline acceptable methods for implementing the NRC's regulation in this area.

In March 2010, NANT ACAD 10-001, "Guidelines for Initial Training and Qualification of Licensed Operators," Revision 0 superseded prior NANT guidelines for Initial Training and Qualification of Licensed Operators. One of the changes in NANT ACAD 10-001 is a change in the experience requirement for direct SRO degreed personnel from a minimum of three years experience to 18 months of Responsible Nuclear Power Plant Experience (RNPPE) as defined in the NANT ACAD. Mr. Baxter has 20 months of RNPPE (i.e., 20 months as a qualified Operations field supervisor) and Mr. Montpetit has 22 months of RNPPE (i.e., 22 months as a qualified non-licensed operator). Thus, both candidates meet the experience requirements specified in the current NANT guidelines. Precedent for reduced direct SRO experience requirements provided for in ACAD 10-001 has recently been established for Prairie Island Nuclear Generating Station (ML112901115).

NUREG-1021, Revision 9 states:

"When a facility licensee's licensed operator training program description and/or licensing-basis documents contain education and experience requirements that are more restrictive than either Revision 3 of RG 1.8 or the current NANT guidelines, the most restrictive requirements will continue to apply pending the initiation of action by the licensee to amend these requirements; any required TS changes would be considered administrative in nature."

Prior to the next scheduled operator license examination, EGC intends to submit a License Amendment Request to replace the existing education and experience eligibility requirements for operator license applicants consistent with NANT ACAD 00-003 with NANT ACAD 10-001. However, on the basis that the current regulatory requirement specified in the TS 5.3.1 referenced letter is consistent with the education and experience eligibility requirements in NANT ACAD 00-003, EGC requests a waiver of the experience requirements for Mr. Baxter and Mr. Montpetit in accordance with NUREG 1021, Revision 9, Supplement 1, ES-204. EGC understands that a Request for Waiver would need to be formally requested and documented on the NRC License Application Form 398 when it is submitted, in the event that such waiver is granted.

If there are any questions regarding this submittal, please contact Mr. Gary Dudek, Braidwood Training Director, at (815) 417-4000.

Sincerely,

A handwritten signature in dark ink, appearing to read "Daniel J. Enright", written in a cursive style.

Daniel J. Enright
Site Vice President
Braidwood Station

cc: Operations Branch Chief, NRC Region III